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Attorney for Nancy Tan

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No. CR-06-00030-JSW
)	
Plaintiff,)	STIPULATION AND [PROPOSED]
)	ORDER EXTENDING DATE TO SELF-
Vs.)	SURRENDER
)	
NANCY TAN,)	
)	
Defendant.)	
)	
)	
)	

Defendant Nancy Tan, by and through her attorney, Steven F. Gruel, hereby requests that her date to self-surrender to begin serving her sentence in this case be extended by one (1) day. Currently, Ms. Tan has been ordered by the Court to self-surrender on Sunday May 10, 2009. However, Ms. Tan respectfully requests an additional day to self-surrender for two (2) reasons:

1) Because her current self-surrender date falls on the weekend there will be no staff to process her as a new inmate until the next weekday which results in her placement in isolation for that one day; and 2) May 10, 2009 is Mother's Day and Ms. Tan would appreciate the opportunity to spend the day with her son.

STIPULATION AND ~~[PROPOSED]~~ ORDER EXTENDING DATE TO SELF-SURRENDER

Ms. Tan's Pretrial Officer, Josh Libby, who is assigned to this case is aware of this request for a single day extension and does not oppose this request. The prosecution does not oppose this request.

SO STIPULATED:

DATED: 5/6/09

_____/s/_____
STEVEN F. GRUEL
Attorney for Nancy Tan

DATED: 5/6/09

_____/s/_____
KYLE WALDINGER
Assistant United States Attorney

~~PROPOSED~~ ORDER

PREDICATED on the above stipulation and GOOD CAUSE APPEARING, defendant Nancy Tan's date in which she is to self-surrender to begin serving her sentence in this case is extended one (1) day from May 10, 2009 to noon on May 11, 2009.

IT IS SO ORDERED.

May 7, 2009



HONORABLE JEFFREY S. WHITE
United States District Court Judge

STIPULATION AND ~~PROPOSED~~ ORDER EXTENDING DATE TO SELF-SURRENDER